FYI – Bob's response…

From: Judge, Robert
Sent: Thursday, May 02, 2013 1:54 PM
To: Kurpius, Meredith; Brown, Ryan; Garver, Daniel; Hall, Chris
Cc: Lakin, Matt; Kahn, Peter R.; Payton, Richard; devose, pauline; chow, alice; Hence, Kia
Subject: RE: "Revised" AMP600

Thanks--- First, notice that the distribution list now includes Region 1, 3, 4, 8, 9 and 10.

Appreciate your thoughtful comments:

On your first point- I think green on the AMP600 was intended to be the meets CFR/ regulatory/ guidance "requirement." Yellow was viewed as a slight deviation, and red was viewed as a significant deviation (deserving of an "N") (Also—you'll note that 3 yellows make an "N" recommendation—*3 strikes- you're out logic*.) So as far as a tool indicating the quality of the data —the AMP600 would do this by looking at its details. Being part of the workgroup- I do think the values/ colors help the reader (be it the local, the state, or EPA) look at the report, and get an indication of the severity of the problem—am I all green- do I have yellow, do I have red. What's nice about those criteria are that they can be tightened over time—to mean that you focus on the really "bad" stuff first, and then tighten (You may have noticed—that originally the AMP600 turned red for (PM2.5) CV greater than 18%. They found a lot of red- so they changed the range—to make red only come on at 25%. Note that this concept isn't really much different than that which occurred for ozone p-check./ span—making it 7% rather than 10% in our validation templates- if I'm recalling correctly). Anyway- clearly, it could be made a bright line- and everyone gets an "N" for "concurrence" for any CFR/ QA/ completeness deviation. But I like the idea of the tool pushing towards this gradual improvement—curious what other Regions think?

On the cascading of "N" to be the EPA recommended (and arguably cascading "Y" the same way), a recent conversation with Mike indicates he thinks we can fix this—by just changing program— and I think they are open to that (ie, all would go to "S"—until the EPA Region says otherwise—ie, "Y" or N"-. Or maybe- left as "S" for some time—which is essentially what has been done- by us not setting most of these flags in AQS for years..)

The term "concurrence" is not perfect. My main goal is to not use certification as the term. "Meets AMP600 criteria" is the most correct term.., but not sure HQ likes that. ("Meets data evaluation criteria?") And the key is changing the field name in AQS as well, not just this report

I do think there is beginning to be some support of an AQS field which is "certified by State" (did they/ State send in a letter certifying?). I think if that occurred, I've heard of other changes/ fields that might be added.. (sort of like why the tax code is the way it is…LOL)

OAQPS is open to the concepts that I've put forward thus far—for virtually immediate fixes (ie, re-labeling columns, redefining "concurrence" (or other term) so its not certification, and not cascading "N" to the EPA "concurrence" column.   Will this suffice for short term for all Regions?

I think longer term—they are open as well—but adding fields to AQS, etc will be something we will need to continue to engage on…

Thanks

From: Kurpius, Meredith
Sent: Thursday, May 02, 2013 4:08 PM
To: Judge, Robert; Brown, Ryan; Garver, Daniel; Hall, Chris
Cc: Lakin, Matt; Kahn, Peter R.; Payton, Richard
Subject: RE: "Revised" AMP600

Bob,

I just spoke with others here in R9. I know you are working hard to find a livable solution. As we have said before, our fundamental view is that data certification and EPA's assessment of data quality are two separate actions. Your rewording is a step to make this more transparent but we would still ultimately prefer some indicator that the certification requirement was met and optionally a field that indicates data quality. So that's the long-term view. Regarding your specific recommendations, I think they are helpful, even if they don't completely address the resource and litigation concerns that R9 has with this process. Here are some specific thoughts (with some transgressions into our fundamental issues):

1. If the results of the AMP600 are going to show up in summary reports automatically to reflect issues regarding completeness, QA checks, etc. then the criteria to assign an N would preferably be based on the CFR and/or QA Handbook criteria. This would work with Chris Hall's idea to call them "critical criteria." If the point of the AMP600 is to identify cases where there are possible concerns with data completeness, the lack of performed quality assurance checks or the results of uncertainty statistics then we should include all the cases that QA requirements/guidance would identify. It dilutes the N if there are monitors with known issues getting Y's (type II error or false negative). It also undermines the Regional Office's use of the AMP600 as a tool to review data for design value review, clean data findings, etc. It sounds like the primary reason that the AMP600 wasn't based on requirements/guidance was because there were too many N's showing up. To me, the AMP600 is a better tool if it accurately identifies requirement/guidance transgressions rather than seemingly arbitrary criteria. Of course the "too many N's" issue could be resolved by simply propagating an S into the summary reports, rather than an N (sorry, I jumped back on my soapbox).
2. R9 does not think that the report should be saying the N means "the certifying agency has submitted the certification letter and required summary reports, ==but EPA has determined that issues== regarding…" if the N gets applied automatically since it could also mean that EPA hasn't reviewed it. This approach gives the appearance of an EPA judgment without there actually having been one. We still feel that both the terms "Certified" and "EPA Concurrence" are misleading if an N gets applied with no judgment by EPA. I wish I could give a suggestion here but [warning, soapbox moment coming again] the reason we can't

come up with a good term for this field is because it is not obvious what it represents except conformance to the AMP600 criteria. We can't even say something like, "Possible QA issues" since there will be Y's that actually have possible QA issues since the AMP600 is looser than CFR/guidance.

Also, we whole-heartedly support the addition of a certification field. That would be more useful than the EPA Concurrence field for us since we have 15-20 different agencies certifying hundreds of monitors with many overlapping jurisdictions.

If you want to tackle some of these larger issues (e.g., AMP600 criteria) post-certification, that would be ok with us. The reason we have been waiting to weigh in is that we needed to see how this process played out. We don't mean to be giving a late hit. You have heard us express abstract concerns but it was not until we saw the process in action that we were able to give concrete feedback. How open is OAQPS to revising the process in the coming year? If they are willing to continue working on this then we could find work-arounds for this year given the changes you have suggested.

Again, thanks for all your efforts in reconciling this.

-Meredith

From: Judge, Robert
Sent: Thursday, May 02, 2013 9:18 AM
To: Kurpius, Meredith; Brown, Ryan; Garver, Daniel; Hall, Chris
Cc: Lakin, Matt; Kahn, Peter R.
Subject: "Revised" AMP600

Hi all- Since you've expressed some concerns with the way the AMP600 describes/ handles certifications- with Mike Papp's support, I've made some suggested changes to the report. (though he has not seen these suggested changes specifically.) Note, I'm not touching any of the bugs, or programming issues.. or even the cascading or not, of "N"s.

I think these edits reflect a more true reflection of what this report does- it evaluates the data that the State has certified- and provides us with a tool to determine if we are in "concurrence" about whether or not there are data quality issues with the data that has been certified. (Note that on page 1- I have a question about the need to add another column in the AMP600 to reflect that all data are certified. Please weigh in…)

You'll note that this pdf is missing some pages—note that it is my intention that similar/ identical changes be made to each pollutant by pollutant evaluation page.

If this goes forward, I would certainly be more comfortable applying an "N" to a monitor…. Specifically- "N" means…"the certifying agency has submitted the certification letter and required summary reports, but EPA has determined that issues regarding the quality of ambient concentration data cannot be resolved due to data completeness, the lack of performed quality

assurance checks or the results of uncertainty statistics shown in the AMP 255 or AMP 600 reports."

In addition- beyond the changes to the AMP600, at a minimum, the AQS field currently called "certification" would be renamed to "concurrence."   (And longer term, my thought would be that AQS includes another field named "certified" which would be filled in as "Y" if the State sends in the required letter and reports under 58.15—without any further evaluation of the data by EPA.)

Please advise if these changes would (help)resolve your concerns- and/ or other added issues to address.

Thanks,
Bob

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